## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

DIGITAL MEDIA SOLUTIONS, LLC,	) CASE NO. 1:19-cv-145
Plaintiff,	) JUDGE DAN AARON POLSTER
v.	) MAGISTRATE JUDGE ) THOMAS M. PARKER
SOUTH UNIVERSITY OF OHIO,	)
LLC, et. al.,	)
	)
Defendants.	)

## NOTICE OF STATUS OF OBJECTIONS TO MOTION TO APPROVE SETTLEMENT AGREEMENT (DOCKET NO. 82)

Mark E. Dottore, Receiver of the Receivership Entities, hereby provides this notice to the Court regarding the status of the objections that have been filed to the Receiver's Motion to Approve Settlement Agreement (Doc. No. 82) (the "Motion"). Per communications with several parties, the Receiver believes the following represents the status of the pleadings that contained objections to the Motion:

- 1. The Response of the Buncher Company to the Motion (Doc. No. 125) has been withdrawn pursuant to an Agreed Order Surrendering Possession of Premises to Intervening Landlord, the Buncher Company, Relieving Injunction and Stay as to Certain Leased Premises and Leases, and Related Relief (Doc. No. 146);
- 2. The Reservation of Rights of Flagler Master Fund SPC Ltd. ("Flagler") Regarding the Motion (Doc. No. 128) may have been addressed by the language included in the Second Supplement to the Settlement Agreement. That language was included at the request of Flagler and was approved by Flagler; and
- 3. The Receiver has been informed by counsel for Studio Enterprise Manager, LLC ("Studio") that it is in discussions with Dream Center

South University, LLC ("South") and is attempting to resolve South's objection(s).

The Receiver is providing this Notice for the convenience of the Court given the upcoming hearing on the Motion.

Respectfully submitted,

/s/ Robert T. Glickman Robert T. Glickman (0059579) Charles A. Nemer (0009261) Robert R. Kracht (0025574) Hugh D. Berkson (0063997) Nicholas R. Oleski (0095808) McCarthy, Lebit, Crystal & LIFFMAN CO., LPA 101 West Prospect Avenue 1800 Midland Building Cleveland, Ohio 44115 (216) 696-1422 - Telephone (216) 696-1210 - Facsimile rtg@mccarthylebit.com can@mccarthylebit.com rrk@mccarthylebit.com hdb@mccarthylebit.com

Special Counsel for the Receiver

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## **CERTIFICATE OF SERVICE**

The foregoing was electronically filed this 13th day of March, 2019. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

Parties may access this filing through the Court's system.

/s/ Robert T. Glickman
Robert T. Glickman (0059579)

Attorney for Mark E. Dottore, Receiver